Military Type Certificate Holder Responsibilities

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Scope

• Background
• Problem
• Solution
Background

• **DASR 21 -> EMAR 21 -> EASA 21**

• **EASA 21:**
  - TC applicant is Aircraft OEM
  - TC holder must demonstrate capability
  - TC holder obligations required by law
  - Aircraft only operate within TCB

• **EMAR 21 unchanged**
  - Except for addition of ‘military’
**Problem**

- **Phase 1 transition**
  - Maintain current levels of safety
  - Minimal changes
  - AMTC and AwB processes continue

- **AMTC**
  - Aircraft OEM is not the applicant
  - Applicant is different to the holder
  - Org performing holder obligations may not represent the OEM
  - Many Commonwealth organisations lack design capability
  - DASR are not enshrined in Aust law
  - Aircraft don’t always operate within TCB
Problem

- TC vs MTC
  - Not all Defence aircraft are derivatives of a civil TC design
  - Not all Defence aircraft have a military TC issued for the base aircraft
  - Some Defence aircraft are members of a global fleet
  - Geographical distance from TC holder
Solution

1. Recognise civil/other TC process
   - Contribution to Australian config
   - Do we need to issue an AMTC?

2. Why do we issue AMTCs?
   - Document the Australian configuration
   - Establish initial safety of the design
   - Control the Type Design
   - (new) actively manage TD in-service
AMTC process

1. Defence Project Office is the applicant
   - PEM delegation to verify/review compliance findings
2. AMTCs issued only to Defence orgs
   - Org performing holder obligations not representative of OEM
   - Holder ‘rights’ incompatible with AMTC use
3. Defence org holds AMTC only if capacity can be demonstrated
   - Legacy SPOs only (not Thin SPOs)
4. DGTA retains AMTC if no suitable Defence org
   - MTC holder delegate to manage AMTC on Authority’s behalf
   - TLS contractor MDOA holder does not hold the AMTC
MTC holder delegate

• Application:
  – DASR Form 4
  – MTCH exposition
MTCH exposition

- Aircraft type design assessment
- Support from through other civil or military TCs
- Military operational role and environment
- Key organisations managing the aircraft’s type design
- Australian military capabilities
  - individual key engineering positions
  - ability to recruit and train new staff
  - access to data
- Other military and civil operator’s programs
- MTC holder arrangements
MTC holder delegate

• Duties:
  – Ensure commercial MDOA holder is contracted to perform holder obligations
  – Oversight commercial MDOA holder’s performance of obligations
  – Assess Type Design risk of ops outside the cert basis
    • Coordinate the input of SMEs
    • Advise operator through CAMO
Foreign organisations

- Equivalency to DASR 21 MDOA holder
- Equivalency of MTC holder obligations
- Proposal for oversight
- Treatment of products/designs